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zation, and that violation of the act shall constitute a misdemeanor. Plaintiff, in the case of *Coppage v. Kansas*, 35 Supreme Court Reporter, 240, was a railway superintendent. He presented to one Hedges, an employee of the company, a form of agreement that he would withdraw from the Switchman's Union of which he was a member. Upon his failure to sign this he was discharged by Coppage, who was thereupon charged with violation of the act above noted, convicted, and the judgment affirmed by the Kansas Supreme Court. The United States Supreme Court takes up the question of the constitutionality of the statute, and holds that, as applied to employees under no incapacity or disability, it constitutes an infringement of liberty and property without due process of law in violation of the fourteenth amendment to the federal Constitution.

Effect of Unaccepted Pardon.—In the course of the investigations of a federal grand jury sitting in the District Court of the United States for the Southern District of New York, George Burdick, city editor of the New York Tribune, was called as a witness and requested to give the source of his information concerning articles in that paper relative to certain custom frauds. He declined to answer on the ground that to do so might tend to criminate him. He was thereupon remanded to appear at a later date, at which time a pardon for any supposed offense of which he might be guilty in connection with the matter before the grand jury was handed to him, and he was again requested to give his testimony. This he again refused to do and also refused to accept the pardon. Further opportunity was furnished him to give evidence, and upon his declining to do so he was found guilty of contempt of court and sentenced to pay a fine. He thereupon brought proceedings in error to the United States Supreme Court. The opinion of this tribunal is found under the title *Burdick v. United States*, 35 Supreme Court Reporter, 267. The court goes into an elaborate discussion of the nature and effect of pardons and the distinction to be drawn between them and legislative immunity from criminal prosecution. The conclusion is reached that a pardon may be refused by the person to whom it is granted, and that he does not under such circumstances forfeit his right of privilege as a witness.